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**Cc:** []  
**Bcc:** CN=Rene Fuentes/OU=R10/O=USEPA/C=US@EPA[]  
**From:** CN=Rene Fuentes/OU=R10/O=USEPA/C=US  
**Sent:** Fri 6/8/2012 9:43:51 PM  
**Subject:** Re: Triangle Park AM new language  
TP draft AM 5 30 12 +RF changes.docx

Mark,

I have altered the AM with what you had sent to me on your email, as well as other additions which I made in an attempt to have the story flow a bit more transparently and logical.

I am assuming that you did fix the tables, so I did not do anything with that, but with the hope that the logic on reading the tables will be clear when referenced in this document.

The document has additions and comment bubbles in track changes.

René

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**From:** Mark Ader/R10/USEPA/US  
**To:** Rene Fuentes/R10/USEPA/US@EPA, Elizabeth Allen/R10/USEPA/US@EPA  
**Date:** 06/05/2012 01:23 PM  
**Subject:** Triangle Park AM new language

Does this help set the stage??

The purpose of this Action Memorandum (AM) is to request and document approval of a non-time-critical removal action for the University of Portland (UP), Triangle Park site located at 5828 North Van Houten Place, Portland, Multnomah County, Oregon (Site). The Site is situated within the Portland Harbor (PH) Superfund Site.

UP qualified as a Bona Fide Prospective Purchaser as defined in Section 101(40) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601(40) prior to

purchasing the Site. An Engineering Evaluation/Cost Analyses (EE/CA) was undertaken by the UP pursuant to a Bona Fide Prospective Purchaser Agreement (BFPPA) and Order on Consent for Removal Action. In addition to the BFPPA with EPA, the UP entered into an agreement with the former property owner to purchase the property then referred to as Triangle Park, and concurrently entered into a separate Prospective Purchaser Agreement (PPA) with the ODEQ. The UP closed on the purchase of the property in December 2008. Under the terms of the BFPPA, the parties agreed that an EE/CA would be completed and any removal action work at the site would be consistent with CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, and codified at 40 CFR Part 300 (the NCP), EPA removal action guidance and be performed with EPA oversight. Additionally, the under the BFPPA the EPA and UP agreed to implement the Record of Decision issued by the ODEQ in 2005.

## II. SITE CONDITIONS AND BACKGROUND

The CERCLIS ID No. is ORSFN1002155 and the Site ID No. is 10EC.

### A. Site Description

#### 1. Removal site evaluation

There is substantial information from previous investigations, and the Removal Assessment completed as part of the EE/CA, indicating that human health and environmental impacts associated with historic operations are present at the Site. There is wide spread low level contamination throughout the Site and the entire length of the shoreline adjacent to the Site has also been impacted by historical operations.

In 2005, the ODEQ issued a ROD which identified 22 areas on the site with contamination between 10 and 100 times screening levels that met the ODEQ hot spot definition. The majority of the work outlined in the ODEQ ROD, including excavation of approximately 800 cubic yards of soil hot spots, capping of approximately 5,000 square yards of residual contaminated soil, and implementation of institutional controls, has not yet been implemented pending the ongoing CERCLA removal action process.

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